

# **EXHIBIT 14**

**FILED UNDER SEAL**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
3 SONOS, INC.,  
4 Plaintiff,  
5 vs. Case No. 3:21-CV-07559-WHA  
6 GOOGLE LLC  
7 Defendant.

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8 -AND-

9  
10 GOOGLE LLC,  
11 Plaintiff,  
12 vs. Case No. 3:20-CV-06754-WHA  
13 SONOS, INC.,  
14 Defendant.

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15 \*\*HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY\*\*

16 ZOOM DEPOSITION OF DEBAJIT GHOSH  
17 (Reported Remotely via Video & Web Videoconference)  
18 Menlo Park, California (Deponent's location)  
19 Friday, May 20, 2022  
20

21 STENOGRAPHICALLY REPORTED BY:  
22 REBECCA L. ROMANO, RPR, CSR, CCR  
23 California CSR No. 12546  
24 Nevada CCR No. 827  
25 Oregon CSR No. 20-0466  
Washington CCR No. 3491  
JOB NO. 5245569  
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1 integration launched, correct? 02:50:27	1 That was -- 02:53:50
2 MS. BAILY: Object to form.	2 Q. Was that cloud queue service -- oh,
3 THE DEPONENT: We discussed the -- the --	3 sorry. Go ahead.
4 the beer test, you know, terminology prior to --	4 A. I was going to say, that was, in fact,
5 with, you know -- Sonos and -- and Play Music had 02:50:48	5 the original push and inspiration for building out 02:54:00
6 discussions about that beer test prior to the	6 the cloud queue, was to support a better Chromecast
7 Play Music-Sonos initial integration launch.	7 integration.
8 Q. (By Mr. Grosby) Okay. And -- and you	8 Q. And was the cloud queue service just for
9 would agree that Google's work on the cloud queue	9 Google Play Music?
10 implementation began in earnest after the 02:51:07	10 A. The cloud queue service that we were 02:54:21
11 Sonos-Google Play Music integration launch?	11 building was specific to Google Play Music.
12 MS. BAILY: Object to form.	12 Q. Was the cloud queue service implemented
13 THE DEPONENT: I had engineers work on	13 to work with MRP?
14 actually building out the cloud queue service	14 MS. BAILY: Object to form.
15 after -- you know, I had them shift over to that 02:51:29	15 THE DEPONENT: Cloud queue -- from what I 02:54:40
16 after building out the Play Music-Sonos -- initial	16 remember, cloud queue and MRP are orthogonal
17 Play Music-Sonos integration.	17 things.
18 Q. (By Mr. Grosby) Okay. So you'd agree	18 Q. (By Mr. Grosby) So would you say that
19 with me that temporally the order of events were	19 the cloud queue implementation replaced MRP?
20 Sonos explained the beer test concept, the 02:51:45	20 A. No. 02:54:58
21 Sonos-Google Play Music integration initial version	21 Q. Was the phrase "cloud queue" and "beer
22 launched, and then work on the cloud queue	22 test" used interchangeably at Google?
23 implementation began, correct?	23 MS. BAILY: Object to form.
24 MS. BAILY: Object to form.	24 THE DEPONENT: I don't think I can speak
25 THE DEPONENT: I -- I think you're -- 02:51:58	25 on behalf of all of Google. 02:55:51
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1 the -- the thing I'm struggling with is you are 02:52:00	1 On -- on the Play Music team, at least 02:56:01
2 subsampling the sequence of events.	2 the -- the team members that I was interacting with
3 Within that sequence, as we've talked	3 most closely, we did not use cloud queue and beer
4 about -- and I'm happy to go through the -- the	4 test interchangeably.
5 full sequence again. 02:52:15	5 Beer test was a -- a -- you know, 02:56:13
6 Within that sequence, we started	6 was a -- a concept and the cloud queue was a -- a
7 discussions with Sonos. Sonos and -- and	7 roadmap item that we would talk to Sonos about
8 Play Music started discussions about the	8 whenever they would bring up the -- the beer test.
9 integration. As part of that, Sonos explained the	9 Q. (By Mr. Grosby) So when you said that
10 desire for passing the beer test. We explained our 02:52:34	10 MRP and the -- and the cloud queues are orthogonal, 02:56:46
11 solution for passing the beer test through the	11 can you explain what you mean?
12 cloud queue.	12 A. Yeah. MRP -- media -- if I remember
13 And we then shipped the initial version	13 correctly, stands for media route provider or media
14 of the Play Music-Sonos integration. And then we	14 route protocol, or something like that.
15 started working on the actual cloud queue service. 02:52:52	15 It includes a couple of different 02:57:05
16 Q. (By Mr. Grosby) Okay. Thank you.	16 aspects. The -- the core of that is something that
17 Was the cloud queue implementation	17 allows a media route provider to publish the
18 designed to work with Chromecast?	18 routes, the -- the names of destinations that could
19 A. The cloud queue service that we built was	19 be selected for remote playback.
20 designed to work with a number of our remote 02:53:26	20 And then -- and then, I think, provided 02:57:41
21 playback integrations.	21 the way that the application could send, you know,
22 Q. Was Chromecast one of them?	22 a -- and I think another aspect in -- allowed an
23 A. The cloud queue service that we -- we	23 application to send a media item to that route for
24 built was designed to work with a number of these	24 playback.
25 remote playback integrations, including Chromecast. 02:53:47	25 Cloud queue is a service that we built 02:58:13
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1 for Play Music that -- that allows for a cloud	02:58:20	1 application to play media on a Cast device and	03:02:55
2 service -- I'm sorry -- that allows a remote		2 allows the Cast device to render that media. So it	
3 playback end point to directly get the set of		3 has APIs across -- you know, across that -- that	
4 songs, you know, one song, or whatever, at a time		4 whole stack that I talked about.	
5 from that cloud end point for playback. So there	02:58:53	5 Q. And what does it mean to initiate a Cast	03:03:18
6 are different parts of an overall end-to-end stack.		6 session?	
7 (Discussion off the stenographic record.)		7 A. When I think about initiating a Cast	
8 Q. (By Mr. Grosby) I'd like to move to talk		8 session, I think about the media application	
9 about what happens when a Cast session is		9 running on a device setting up a Cast media session	
10 initiated.	02:59:33	10 on a -- on something like a Chromecast device	03:03:47
11 And in order to do that, I think it would		11 or any -- any Cast compatible device.	
12 be -- it would be good to get an understanding		12 Q. Okay. Mr. Ghosh, if you can look at your	
13 of the -- the terminology of -- of a Cast session.		13 Google Drive, I am dropping in what has been	
14 What do you understand a sender to be?		14 previously marked as Exhibit 14.	
15 A. When I think about -- it's been a long	02:59:49	15 THE DEPONENT: Okay.	03:04:16
16 time since I've thought about this.		16 Q. (By Mr. Grosby) Let me know when you	
17 When I think about Cast, remote playback,		17 have that open.	
18 I think of the sender as the device that the user		18 A. Okay. I have it open.	
19 is interacting with browsing. In the case of		19 Q. So this is a demonstrative that's	
20 music, browsing their music or their media and	03:00:07	20 previously been created to just help us walk	03:04:24
21 issuing playback commands, pause commands, things		21 through an example of a Cast session.	
22 like that.		22 A. Okay.	
23 Q. Would you consider someone's mobile phone		23 Q. So -- so looking at screenshot 1, would	
24 to be a sender?		24 you agree that screenshot 1 shows a song being	
25 MS. BAILY: Object to form.	03:00:32	25 played in Google Play Music on a sender?	03:04:43
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1 THE DEPONENT: I would consider the media	03:00:33	1 MS. BAILY: Object to form.	03:04:48
2 application running on someone's mobile phone or		2 THE DEPONENT: Not -- it's a little bit	
3 their Web browser, or whatever other device, to be		3 hard to tell. But I -- I think not quite. That's	
4 the -- that they're using for controlling playback		4 not what I think I'm seeing.	
5 to be the sender.	03:00:51	5 Q. (By Mr. Grosby) What do you think you're	03:05:02
6 Q. (By Mr. Grosby) And then what's a		6 seeing?	
7 receiver?		7 A. Sorry. This is a little bit hard to --	
8 A. In a remote playback integration, I think		8 to tell because I'm not sure I have the full	
9 of the receiver as the device that receives the		9 context. But from what I think I'm seeing, I think	
10 commands from the sender and basically follows	03:01:08	10 I'm seeing music playing back locally on what looks	03:05:13
11 those commands and plays the -- the media that it's		11 like a phone.	
12 been told to play.		12 Q. Right. So -- right.	
13 Q. And then what's the difference between		13 So the phone would be the sender, right?	
14 MRP and Cast?		14 MS. BAILY: Object to form.	
15 A. I'm trying to remember the details.	03:01:47	15 THE DEPONENT: There were -- I'm sorry.	03:05:42
16 As I think we discussed before, MRP is a		16 Go ahead.	
17 API on Android that allows -- allows, you know,		17 MS. BAILY: Sorry. Object to form.	
18 media providers to publish a list of routes of		18 Go ahead.	
19 destinations for remote media playback and allows		19 THE DEPONENT: If there were a Cast or	
20 for some commands to be sent through that that's an	03:02:21	20 remote play -- like this icon -- this integration	03:05:55
21 Android API.		21 is more general than Cast. That icon is also used	
22 And -- and Cast is -- when I think of		22 for Bluetooth playback, from what I remember. It	
23 Cast, I think of the Cast API for use with		23 was used in Sonos remote playback.	
24 Chromecast and -- and related devices that has		24 So if a user presses that icon and	
25 libraries on multiple platforms and allows a media	03:02:47	25 connects with a Chromecast or a Cast device, then	03:06:24
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